

**BARRICK**

**BARRICK RESOURCES (USA), INC.**

Direct file 11/04/92  
cc to DRW  
W. H. H. H.

December 1, 1992

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DIVISION OF  
OIL GAS & MINING

Mr. Lowell P. Braxton  
Associate Director  
Division of Oil, Gas and Mining  
Utah Department of Natural Resources  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

Dear Mr. Braxton:

Subject: Draft Reclamation Policies

Barrick appreciates the opportunity to review and comment on the proposed draft reclamation guidelines entitled "Design and Reclamation of Steep Slopes and Highwalls" and "Pit Reclamation." The following observations are offered:

- The "Guidelines" as drafted should be withdrawn. The language and format indicate prescriptive, inflexible standards and operating procedures which were not the intent of the documents.
- Economic considerations must be specifically identified in any document generated by the Division designed to accurately reflect existing hardrock reclamation scenarios.
- The Division is reminded that the term "pit backfilling" is not addressed in the statute or rules and is therefore an improper subject for an interpretive guideline.

The development of permitting and compliance aids to assist operators would be beneficial to the Utah hardrock minerals industry. A cooperative effort to complete this task should be undertaken. This effort should include visitations by Division staff to operating facilities and candid discussions between industry and Division professionals to complete the process in a timely manner and to accommodate effective technology transfer.

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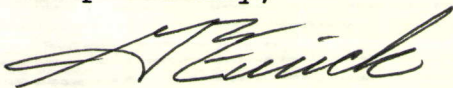


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Barrick looks forward to working with the Division. The formulation of more reasoned documents designed to provide consistency in interpretation and implementation of existing rules will benefit both the Utah hardrock minerals industry and the state.

Thank you for your consideration.

Respectfully,



Glenn M. Eurick  
Environmental Affairs Coordinator (USA)

GME/cg

cc: C. L. Landa  
D. R. Bird

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